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May 8, 2012

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: WC Dockets 09-197 and 11-42, Compliance Plan of Capital Communications Consultants, Inc.

Dear Secretary Dortch:

Pursuant to the Commission's recent Lifeline Reform Order and Public Notice, attached please find the compliance plan of Capital Communications Consultants, Inc. ("Capital Communications"). Capital Communications requests expedited approval of its Compliance Plan so that its pending state applications for eligible telecommunications carrier may be approved.

Respectfully submitted,

Danielle Frappier

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¹ Lifeline and Link Up Reform and Modernization et al., WC Docket No. 11-42 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012); Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, Public Notice, DA 12-314 (WCB rel Feb. 29, 2012).

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of

Lifeline and Link Up Reform and Modernization

Telecommunications Carriers Eligible to Receive Universal Service Support WC Docket No. 11-42

WC Docket No. 09-197

COMPLIANCE PLAN OF CAPITAL COMMUNICATIONS CONSULTANTS, INC.

Capital Communications Consultants, Inc. ("Capital Communications") through its undersigned counsel, hereby seeks to avail itself of the Federal Communications Commission's ("Commission") grant of forbearance from the "own facilities" requirement set forth in 47 U.S.C. § 214(e)(1)(A) by submission of this Compliance Plan. Capital Communication's Compliance Plan is filed in accordance with the procedures established in the *Lifeline Reform Order*¹ and clarified the *Public Notice* issued by the Wireline Competition Bureau on February 29, 2012.²

¹ Lifeline and Link Up Reform and Modernization et al., WC Docket No. 11-42 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (FCC rel. Feb. 6, 2012)

^{(&}quot;Lifeline Reform Order").

² Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, Public Notice, DA 12-314 (WCB rel. Feb. 29, 2012) ("Public Notice").

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INTRODUCTION AND SUMMARY

Capital Communications respectfully requests expeditious approval its Compliance Plan so that it may provide essential Lifeline service to eligible low-income customers in the state in which it has previously been designated as an ETC and may provide service to additional eligible low income consumers in the various states in which it has pending applications or plans to file ETC petitions. Capital Communications has been designated an ETC in Alabama, and will soon launch services in that state.³ It also has pending ETC applications in Louisiana, North Carolina and South Carolina, and plans to apply in additional states.

As set forth below, Capital Communications will fully comply with all conditions set forth in the Commission's recently amended Lifeline rules and with all pertinent conditions set forth in the Lifeline Reform Order. This Compliance Plan describes the measures Capital Communications already has implemented or intends to implement in order to achieve full compliance with the Commission's Lifeline rules and policies. For the convenience of the Commission, this Compliance Plan follows the format established by the Wireline Competition Bureau in the *Public Notice*.

³ Capital Communications also provides service to Lifeline-eligible consumers in Alabama, Georgia, Kentucky and South Carolina by reselling the lines of an incumbent local exchange carrier ("ILEC") that incorporate a Lifeline discount.

I. INFORMATION ABOUT CAPITAL COMMUNICATIONS AND THE LIFELINE PLANS IT OFFERS

A. Company Information

Capital Communications Consultants, Inc. ("Capital Communications") is a Georgia corporation with headquarters in Bartlett, Tennessee. The owner of Capital Communications is Bryan Michael. Capital Communications has no subsidiaries and operates under the name "Capital Communications" or "CapCom." Capital Communications has no affiliates that participate in the Lifeline or any other federal universal service program.

B. Capital Communications' Financial and Technical Capabilities to Provide Lifeline Service

Capital Communications has been approved to offer Lifeline service in Alabama and has applied for ETC status in Louisiana, North Carolina, and South Carolina. Capital Communications does not seek, and will not accept, High Cost support in any of those states, or in the states in which it is already approved as an ETC.

Capital Communications is financially stable and fully capable of honoring its service obligations to customers, as well as federal and state regulatory obligations. Although Capital Communications will derive the majority of its revenue from the sale of wireline services, Capital Communications does not rely exclusively on USF disbursements to operate because its subscribers pay an out-of-pocket charge for the portion of the service not covered by the Lifeline subscribers also pay out-of-pocket for toll charges associated with long distance traffic. Capital Communications also provides service as a competitive local exchange carrier to non-Lifeline subscribers.

Finally, Capital Communications has not been subject to any enforcement action or ETC revocation proceeding in any state.

C. Geographic Area of Capital Communications' Service Offerings

Capital Communications is prepared to offer Lifeline service in Alabama and in additional states upon approval of its ETC applications. The company is poised to rapidly expand its operations once its pending ETC applications are approved by various state regulatory commissions.

D. Capital Communications' Lifeline Service Plans

Capital Communications will offer the following wireline service plan under the Lifeline program: unlimited local calling, caller ID, call waiting and three-way calling for a monthly charge of \$29.24 for non-Lifeline subscribers, and a monthly charge of \$19.99 for Lifeline subscribers after application of the standard \$9.25 discount, with certain discount plans being offered periodically. Toll blocking is provided free of charge to Lifeline subscribers. Capital Communications will offer services on a postpaid basis.⁴

II. CAPITAL COMMUNICATIONS' PLANS FOR COMPLIANCE WITH NEW COMMISSION RULES RELATING TO DETERMINATIONS OF SUBSCRIBER ELIGIBILITY FOR LIFELINE SERVICES

Capital Communications will comply with the requirements pertaining to consumer qualifications for Lifeline set forth in new section 54.409 of the Commission's rules⁵ upon its effective date and any state-specific requirements in the various states in which Capital Communications has been (or will be) designated an ETC. More specifically, Capital Communications will require all subscribers to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new

⁴ Capital Communications is shifting from its current prepaid payment model to a postpaid model. Existing prepaid customers will be grandfathered and continue to pay on a prepaid basis. Beginning in June 2012, new customers will be billed on a postpaid basis.

⁵ 47 C.F.R. § 54.509.

47 C.F.R. § 54.409(a)(2) or 47 C.F.R. § 54.409(a)(3). Capital Communications also will confirm that the subscriber is not already receiving a Lifeline service and that no one else in the subscriber's household is subscribed to a Lifeline service.⁶

A. Capital Communications' Procedures to Determine Consumer Eligibility for the Lifeline Program

If Capital Communications cannot determine an applicant's eligibility for Lifeline by accessing income or program eligibility databases, Capital Communications personnel (either employees or third party customer service representatives) or its marketing agents will review documents to establish eligibility in accordance with the criteria set forth in 47 C.F.R. § 54.409. All Capital Communications personnel and agents who interact with existing Lifeline customers or Lifeline applicants will be fully trained on the Commission's revised Lifeline eligibility rules and Capital Communications' practices and policies designed to implement these new rules.

Capital Communications will follow the Commission's requirements pertaining to acceptable documentation to establish eligibility based either on income level or participation in a qualified government assistance program, unless otherwise established by a state Lifeline administrator or other state agency. Specifically, acceptable documentation of program eligibility will include: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (e.g., the consumer's Supplemental Nutrition Assistance Program ("SNAP") electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.⁷ Acceptable documentation of

⁴⁷ C.F.R. § 54.409(c).

⁷ Lifeline Reform Order at ¶ 101.

income eligibility will include: (1) the prior year's state, federal, or Tribal tax return; (2) current income statement from an employer or paycheck stub; (3) a Social Security statement of benefits; (4) a Veterans Administration statement of benefits; (5) a retirement/pension statement of benefits; (6) an Unemployment/Workers' Compensation statement of benefit; (7) federal or Tribal notice letter of participation in General Assistance; (8) or a divorce decree, child support award, or other official document containing income information. If the prospective subscriber presents Capital Communications with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months. Capital Communications personnel and agents will examine and record the type of documentation presented by each prospective Lifeline subscriber, but will not retain copies of these documents. If an applicant is unable to provide documentary proof of eligibility based on either household income level or current participation in a qualified program, Capital Communications will deny that application.

B. Capital Communications' Procedures for Subscriber Certifications

In the *Lifeline Reform Order*, the Commission established a path for a transition to a national database that will be used to confirm the initial and continued eligibility of a Lifeline customer. ¹⁰ Capital Communications will utilize that database when it becomes operational. Until that time, however, Capital Communications will continue to use any relevant state databases where available, and will otherwise adhere to the following procedures for enrolling prospective customers into the Lifeline program.

⁸ 47 C.F.R. § 54.410(b)(1)(i)(B).

⁹ 47 C.F.R. § 54.410(b)(1)(ii) - (iii); 47 C.F.R. § 54.410(c)(1)(ii)-(iii).

¹⁰ See Lifeline Reform Order at ¶ 403.

Capital Communications will implement certification procedures that will enable prospective customers to demonstrate their eligibility by contacting Capital Communications either in person or by telephone, facsimile or over the Internet. Except in states in which applicants are enrolled through a designated state agency, Capital Communications will have direct contact with all prospective customers applying for Lifeline service, either in person through its personnel or agents, or by telephone, facsimile or over the Internet. Prospective customers who do not complete Capital Communications' Lifeline Application in person must return the signed document and eligibility documentation to Capital Communications by mail, facsimile, electronic mail or other electronic transmission. Capital Communications will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 U.S.C. §§ 7001-7006 and any applicable state laws.¹¹

Every prospective subscriber in a non-database state will be required to complete Capital Communications' revised "Lifeline Application," once the new rules become effective. Capital Communications' Lifeline Applications are attached hereto at Exhibit 1. These revised Lifeline Applications conform to the requirements of the *Lifeline Reform Order*, 47 C.F.R. § 54.410(d) and 47 C.F.R. § 54.405. Any Lifeline applications taken by recording oral certifications or through an IVR system will contain all requisite subscriber information and certifications.

Capital Communications will collect the following information from prospective subscribers in its Lifeline Applications: (1) the subscriber's full name; (2) the subscriber's full residential address (P.O. Boxes are not permitted); (3) whether the residential address is permanent or temporary; (4) the subscriber's billing address, if different; (5) the subscriber's date of birth; (6) the last four digits of the subscriber's Social Security number; (7) if the subscriber is

 $^{^{11}}$ See Lifeline Reform Order at ¶ 168; 47 C.F.R. § 54.419.

seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receives benefits; and (8) if the subscriber is seeking to qualify for Lifeline under the incomebased criterion, the number of individuals in his or her household.¹²

In accordance with 47 C.F.R. § 54.410(d), in its Lifeline Applications, Capital Communications will require all Lifeline applicants to certify, under penalty of perjury, that: (1) the subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the subscriber will notify Capital Communications within 30 days if, for any reason, he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit; (3) if the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, that he or she lives on Tribal lands; (4) if the subscriber moves to a new address, that he or she will provide that new address to Capital Communications within 30 days; (5) if the subscriber provided a temporary residential address to Capital Communications, the subscriber will verify his or her temporary residential address every 90 days; (6) the subscriber's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the subscriber's household is not already receiving a Lifeline service; (7) the information contained in the subscriber's application/certification application is true and correct to the best of the subscriber's knowledge; (8) the subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the subscriber acknowledges that he or she may be required to re-certify his or her continued

¹² 47 C.F.R. § 54.410(d)(2).

eligibility for Lifeline at any time, and that his or her failure to re-certify as to continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits. ¹³

In accordance with 47 C.F.R. § 54.410(d)(1), Capital Communications' Lifeline Application will disclose the following information: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the subscriber's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.¹⁴

Finally, in accordance with 47 C.F.R. § 54.405(c), Capital Communications' Lifeline Application will indicate, using easily understood language, (1) that Capital Communications' low income targeted service is a Lifeline service; (2) that Lifeline is a government assistance program; (3) that the service is non-transferrable; (4) that only eligible consumers may enroll in the program; and (5) that the program is limited to one discount per household.¹⁵

C. Capital Communications' Procedures for Annual Verification of Lifeline Customers

In accordance with the requirements of the *Lifeline Reform Order* and 47 C.F.R. § 54.410(f), Capital Communications will annually re-certify all of its Lifeline subscribers by either (1) querying the appropriate eligibility or income databases, confirming that the subscriber

¹³ See Exhibit 1.

¹⁴ *Id*.

¹⁵ *Id*.

continues to meet the program- or income-based eligibility requirements for Lifeline and documenting the results of that review, or (2) obtaining a signed certification from the subscriber that meets the certification requirements set forth in 47 C.F.R. § 54.410(d).

For 2012, Capital Communications will re-certify the eligibility of its Lifeline subscriber base as of June 1, 2012 on a rolling basis, to be completed by the end of 2012, and report the results to USAC by January 31, 2013. ¹⁶ Capital Communications will notify its subscribers in writing that a failure to respond to the recertification request will result in de-enrollment in the Lifeline program. ¹⁷ Capital Communications will de-enroll subscribers who do not respond to the annual verification or fail to provide proof of continued eligibility in accordance with the procedures set forth in 47 C.F.R. § 54.405(e)(4).

III. CAPITAL COMMUNICATIONS' PLANS FOR COMPLIANCE WITH THE FORBEARANCE CONDITIONS RELATING TO PUBLIC SAFETY AND 911/E911 ACCESS

Capital Communications' existing practices comply with the 911/E911 access conditions set forth in paragraph 373 of the *Lifeline Reform Order*. Specifically, Capital Communications currently provides its Lifeline subscribers with 911/E911 access at the time Lifeline service is initiated, regardless of activation status and availability of minutes. Capital Communications' existing practices currently provide access to 911 and E911 services to the extent that these services have been deployed by its underlying wireline carrier. Capital Communications commits to continue these practices going forward.

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Lifeline Reform Order at \P 130.

¹⁷ *Id*. at ¶ $14\tilde{2}$.

IV. CAPITAL COMMUNICATIONS' PLANS FOR COMPLIANCE WITH THE COMMISSION'S MARKETING AND DISCLOSURE REQUIREMENTS FOR PARTICIPATION IN THE LIFELINE PROGRAM

Within six months after the effective date of the *Lifeline Reform Order* (*i.e.*, October 2012), Capital Communications will incorporate into its marketing materials¹⁸ for its Lifeline services, in clear, easily understood language: (1) that the service and supported by Lifeline, a government program; (2) that only eligible consumers may enroll in the program; (3) what documentation is necessary for enrollment; and (4) that the benefit is limited to one per household and is non-transferrable.¹⁹ Capital Communications also will disclose its name (the ETC) on all marketing materials.²⁰ A sample advertisement incorporating this language is attached hereto at Exhibit 2.

V. CAPITAL COMMUNICATIONS' PROCEDURES AND EFFORTS TO PREVENT WASTE, FRAUD AND ABUSE IN CONNECTION WITH LIFELINE FUNDS

Capital Communications shares the Commission's commitment to minimize waste, fraud and abuse of Lifeline benefits. Accordingly, Capital Communications commits to implement a variety of measures and procedures intended to prevent duplicate Lifeline benefits from being awarded to the same household or individual.

<u>Prevention of Duplicates within Capital Communications' Subscriber Base</u>. At the time of initial sign up of a new subscriber, the subscriber's service address will be validated for accuracy against the USPS ("United States Postal Service") database and saved in the USPS-approved format, which permits Capital Communications' subscriber database to more

[&]quot;Marketing materials" includes, but is not limited to print, audio, video, Internet (including email, web, and social networking media), and outdoor signage, that describe the Lifeline-supported service offering, including application and certification forms. *See Lifeline Reform Order* at ¶ 275; 47 C.F.R. § 54.405(c).

¹⁹ *Lifeline Reform Order* at ¶ 275; 47 C.F.R. § 54.405(c).

²⁰ Lifeline Reform Order at ¶ 275; 47 C.F.R. § 54.405(d).

accurately prevent duplicates by preventing variations of the same address from appearing multiple times in the database. Once the address is validated for accuracy and format, it will be checked against addresses for all Capital Communications addresses. If an existing Capital Communications subscriber is receiving service at the same address, Capital Communications' system will not permit any order for Lifeline service to proceed. Capital Communications will also conduct additional checks to ensure that the same subscriber is not receiving more than one service by checking its database for the same subscriber name, date of birth and the last four digits of the person's social security number. Moreover, all orders for Lifeline service as subjected to a secondary USPS accuracy and format check the following day. Any corrections needed as a result of the secondary check, such as correcting address format, will be promptly entered into Capital Communications' system. Capital Communications will also conduct realtime scans of its database to flag any duplicate addresses, dates of birth, etc. in addition to conducting manual reviews of its subscriber lists prior to filing its FCC Form 497s in order to ensure that it does not claim subsidies for any duplicate addresses. Finally, Capital Communications notes that because all its subscribers (including the grandfathered prepaid subscribers) must make an out-of-pocket payment, the activation and non-usage rules found in revised 47 C.F.R. § 54.407(c) do not appear to apply to Capital Communications' operations.

One Per Household Rule. Capital Communications will implement policies and practices in accordance with the Commission's rules and the *Lifeline Reform Order* to ensure that it provides only one Lifeline service per household. As described above, Capital Communications has already implemented procedures to ensure that Capital Communications itself only provides one Lifeline service per household. When the National Lifeline Accountability Database becomes available, Capital Communications will fully comply with the

requirements of 47 C.F.R. § 54.404 and will utilize the database to determine if an applicant is currently receiving Lifeline service from another carrier or if another person residing at the applicant's residential address is receiving Lifeline service. Finally, if Capital Communications has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, for example, due to a violation of the one-per-household rule, Capital Communications will initiate its termination process in accordance with the procedures set forth in 47 C.F.R. § 54.405(e)(1).

VI. CONCLUSION

Capital Communications submits that the foregoing Compliance Plan fully satisfies the conditions set forth in the *Lifeline Reform Order*, the *Public Notice* and the Commission's rules pertaining to Lifeline. Accordingly, Capital Communications respectfully requests expeditious approval of this Compliance Plan so that Capital Communications may continue to provide essential Lifeline service to eligible low-income customers in states where it has previously been designated an ETC and may provide service to additional eligible low income consumers in the various states for which it has pending ETC petitions.

Respectfully submitted,

Danielle Frappier

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(202) 973 - 4200

Counsel to Capital Communications, LLC

May 8, 2012

Exhibit 1 Lifeline Applications



Please Fax: 1-855-254-4610 or

_ Monthly Plan \$19.99 (+9.25 in Lifeline Funding)

Alabama	l ifalina	Applicati	on Earm
Alapama	Lifeline	Application	on Form

Customer Account Number	
Today's Date:	

Fill Out Your Information				
Last Name	First Name		Middle Initial	I
Birth Date	Home Phone Number	Last	4 digits of Social S	ecurity Number
Residential Address (No P.O Boxes for res. Address) This is my (check	City cone): Permanent Address	/ Temporary Addr	State ess	Zip Code
Billing Address (if different)	City		State	Zip Code
LifeLine Application				
I certify that I participate in one of the You must provide documentation de Supplemental Nutrition Assistance Progr	monstrating your current participa am (Food Stamps)	I Public Housing Ass	istance (section 8	
Medicaid		mental Security Incor		
Low-Income Home Energy Assistance Pr	ogram (LIHEAP) Tempo	rary Assistance to Ne	eedy Families Pro	gram (TANF)
If you wish to qualify based on income, a c	lifferent form is required.			
Certification Under Penalty of Pe	erjury			
I certify under penalty of perjury that (che la acknowledge that Lifeline is a federal government de-enrollment or being barred from the program. I acknowledge that only one Lifeline service is available in a common lifeline service. (For purposes of Lifeline, a "househod expenses.) I acknowledge that a household is not permitted to of the rules of the Federal Communications Commission at the time I apply for Capital Communications Consultation I acknowledge that Lifeline is non-transferable and I acknowledge that providing false or fraudulent in I will notify Capital Communications Consultants we participating in any of qualifying program, or if I or a meal I acknowledge that I may be required to re-cert enrollment and termination of my Lifeline benefits. If I move to a new address, I will provide the new a later of I provided a temporary address, I will be required enrolled from the Lifeline program. I authorize Capital Communications Consultants Lifeline and authorize social service agency represent participation in programs that qualify me for Lifeline. I certify that the information contained in this cert	nt benefit and that willfully making false statement benefit and that willfully making false statement is any individual, and that, to the best of midd" is any individual or group of individuals who receive Lifeline benefits from multiple provides and will result in de-enrollment from the Lifeling service, I agree to cancel that Lifeling that I may not transfer my benefit to any other formation to receive Lifeline benefits is punisharithin 30 days if for any reason I no longer satisfimber of my household receives another Lifeline ify to my continued eligibility for Lifeline at a address to Capital Communications Consultants and to verify my temporary address every 90 day to access any records required to verify my statives to discuss with and/or provide informations.	y knowledge, no other person live together at the savers and that violation of the program. If I am partice service with any other person. But by law. By the criteria for receiving benefit. In time, and that my fawithin 30 days. If I do not provide verifactments herein and to elation to Capital Communication to Capital Communication.	erson in my householome address and shathis limitation constitution constitution in another Lirovider. If Lifeline services, such illure to re-certify within 30 days confirm my continue	d is receiving a re income and utes a violation ifeline program ch as no longer ill result in de- ys, I will be de- d eligibility for
Applicant's Signature		D	ate	

Mail: Capital Communication, PO Box 341267, Bartlett, TN 38184

Customer Service: 877-225-8754 www.capcomphone.com



Fill Out Your Information

__ Monthly Plan \$19.99 (+9.25 in Lifeline Funding)

Alabama I	Lifeline <i>I</i>	Application	Form

Customer Account Number

Keep Connected	Today's Date:

Last Name	First Name	Midd	le Initial
Birth Date	Home Phone Number	Last 4 digits of	Social Security Number
Residential Address (No P.O Boxes for res. Address) This is my (check	City_ k one): Permanent Address	State Temporary Address	Zip Code
Billing Address (if different)	City	State	Zip Code

Lifeline Application

I certify that my household income is at or below 135% of the Federal Poverty Guidelines as indicated below:

Eligibility for Lifeline may apply if your household income is at or below 135% of the Federal Poverty Guidelines for a household of that size. Indicate which income range applies to you in the chart. You must provide proof of eligibility based on income, which can include:

- Last year's federal or state tax return
- Current income statement from an employer or paycheck stub (must cover 3 consecutive months within the previous 12 months)
- A Social Security statement of benefits
- A retirement/pension statement of benefits
- An Unemployment/Workers' Compensation statement of benefit
- Federal notice letter of participation in General Assistance
- Divorce decree, child support award or other official document containing income information

Check One	Persons in Household	Annual Income	Monthly Income
	1	\$15,079	\$1,257
	2	\$20,425	\$1,702
	3	\$25,771	\$2,148
	4	\$31,117	\$2,593
	5	\$36,463	\$3,039
	6	\$41,809	\$3,484
	7	\$47,155	\$3,930
	8	\$52,501	\$5,375
	For each add'l person, add:	\$5,346	\$445

Certification Under Penalty of Perjury

I certify under penalty of perjury that (check or initial):

____ I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.

____ I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)

acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for Capital Communications Consultants Lifeline service, I agree to cancel that Lifeline service with any other provider.

- ____ I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- ____ I will notify Capital Communications Consultants within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit.
- ____ I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in deenrollment and termination of my Lifeline benefits.
- ____ If I move to a new address, I will provide the new address to Capital Communications Consultants within 30 days.
- ____ If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be deenrolled from the Lifeline program.

____ I authorize Capital Communications Consultants to access any records required to verify my statements herein and to confirm my continued eligibility for Lifeline and authorize social service agency representatives to discuss with and/or provide information to Capital Communications Consultants verifying my participation in programs that qualify me for Lifeline.

____ I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature Date

Please Fax: 1-855-254-4610 or Mail: Capital Communication, PO Box 341267, Bartlett, TN 38184

Customer Service: 877-225-8754 www.capcomphone.com

Exhibit 2 Sample Marketing Material



- **60 Minutes of Long Distance**
- **Unlimited Local Calls**



www.capcomphone.com

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